

LAWRENCE C. HERSH
ATTORNEY AT LAW
17 Sylvan Street, Suite 102b
Rutherford, New Jersey 07070

*ADMITTED NJ, NY, CA, AND IL

Tel: (201) 507-6300
Fax: (201) 507-6311
email: lh@hershlegal.com

June 22, 2020

Via ECF

Hon. James Clark, III., U.S.M.J.
U.S. District Court of New Jersey
M.L. King, Jr. Building and U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: Vasquez v. Radius Global Solutions LLC.
2:20-cv-02122-KM-JBC

Dear Judge Clark:

I represent the Plaintiff in this matter. I write in response to the slew of dispositive and discovery motions that Defendant has filed in this case, all of which have been filed prior to the Court holding a Rule 16 Conference and prior to the issuance of a Scheduling Order. Additionally, all the motions were filed without the Court's permission. Plaintiff asks that all of the motions be stayed pending a Rule 16 conference or a status call with the Court to sort the timing and appropriateness of these motions.

On March 26, 2020, Defendant filed an Answer to the lawsuit. (Dkt. No. 3). Shortly thereafter, on April 29, 2020, Defendant filed a Motion for Judgment on the Pleadings. (Dkt. No. 5). Opposition was extended pursuant to Judge Wolfson's April 17, 2020 Standing Order No. 2020-09 until June 27, 2020. (Dkt. 7). Late last week, on June 18, Defendant filed a Motion for Summary Judgment. Also, on June 18, Defendant filed a Motion to Stay Discovery. Although the Court has yet to issue a Scheduling Order in this matter, previous Scheduling Orders with your Honor indicate that any such dispositive motions may be filed only with leave of Court. Defendant has failed to seek leave to file either the Motion for Judgment on the Pleadings or the Motion for Summary Judgment.

As such, Plaintiff requests the briefing schedules be stayed on all these motions until the Court holds a Rule 16 Conference or status conference.

Thank you for your consideration to this matter.

Very truly yours,

/s/ Lawrence Hersh
Lawrence Hersh

Cc: All Counsel of Record (via ECF)